

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	
	)	<b>CRIMINAL NO. 2:05-CR-119-MEF</b>
<b>DON EUGENE SIEGELMAN</b>	)	
<b>PAUL MICHAEL HAMRICK</b>	)	
<b>GARY MACK ROBERTS, and</b>	)	
<b>RICHARD M. SCRUSHY.</b>	)	

**RESPONSE TO DEFENDANT ROBERTS' OBJECTIONS TO  
GOVERNMENT EXHIBITS**

COMES NOW the United States of America, by and through Louis V. Franklin, Sr., Acting United States Attorney for the Middle District of Alabama, and Andrew C. Lourie, Acting Chief of the Public Integrity Section of the Criminal Division of the United States Department of Justice, and hereby files its Response to Defendant Roberts Objections to Government Exhibits.

The United States shall establish all bases for the admissibility of each of its exhibits at trial. As to Defendant Roberts' specific objections, the United States responds as necessary as follows. Exhibit 70 refers to the entire "Siegelman Campaign Account," which has already been provided to Defendant Roberts on the hard drive given to him during initial discovery. Attachment A, included herein, specifically identifies -- by directory, file name, and/or Bates number -- the location for Exhibit 70 and certain other documents about which the other defendants complained. Exhibit 70a is a particular record from such account which the government intends to offer at trial. As to Exhibit 75, the government intends to introduce both documents referenced in that exhibit number at trial, and will, to aid the Court and parties sub-designate each document as needed. As to Exhibit 88b, any extraneous labels will be removed prior to the document's introduction at trial.

Finally, the government provides, as Attachment B to this Response, Michael D. Martin's

5K.1 Motion for Departure, designated on the government's exhibit list as Exhibit 33. In addition, the government has renumbered Exhibit 34 as 34a and included Exhibit 34b.

Respectfully submitted this the 21st day of April, 2006

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Respectfully submitted,

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